

LAW OFFICES OF
WALKUP, MELODIA, KELLY & SCHOENBERGER
A PROFESSIONAL CORPORATION

650 CALIFORNIA STREET, 26TH FLOOR
SAN FRANCISCO, CALIFORNIA 94108-2615
T: (415) 981-7210 • F: (415) 391-6965

MICHAEL A. KELLY (State Bar #71460)
mkelly@walkuplawoffice.com
DORIS CHENG (State Bar #197731)
dcheng@walkuplawoffice.com
AMALIE R. YACH (State Bar #364127)
ayach@walkuplawoffice.com
ATTORNEYS FOR PLAINTIFFS
ALLISON WOOTEN AND MICHAEL WOOTEN

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

07/02/2026 at 07:37:03 PM

By: Andrel Gospel,
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

DEPO-PROVERA CASES

26CV197302

Case No.: JCCP5375

THIS DOCUMENT RELATES TO:

**SHORT FORM COMPLAINT FOR
DAMAGES AND DEMAND FOR JURY
TRIAL**

ALLISON WOOTEN and MICHAEL
WOOTEN,

Plaintiffs,

v.

PFIZER INC.; PHARMACIA &
UPJOHN CO. LLC; PHARMACIA LLC;
UPJOHN COMPANY LLC; PLANNED
PARENTHOOD CALIFORNIA
CENTRAL COAST, and DOES 1 through
100, inclusive,

Defendants.

1 The Plaintiffs named below file this Short Form Complaint and Demand for Jury Trial
2 against the Defendant(s) selected in Paragraph 4. Plaintiffs incorporate by reference the allegations
3 and the relief sought in Plaintiffs' Master Complaint and Demand for Jury Trial ("Master
4 Complaint"), filed in Depo-Provera Cases, JCCP No. 5375. Plaintiffs file this Short Form Complaint
5 as required by the Court. As necessary, Plaintiffs may include (a) additional Counts and supporting
6 allegations against Defendants, as set forth in Paragraphs 9 and 10 below and/or (b) additional claims
7 and allegations against Other Defendants not listed in the Master Complaint as set forth in Paragraph
8 4.c below. If necessary, Plaintiffs have attached additional pages to this Short Form Complaint.

9
10 **PARTIES, JURISDICTION, AND VENUE**

11 **A. PLAINTIFF**

- 12 1. Plaintiffs, ALLISON WOOTEN and MICHAEL WOOTEN ("Plaintiffs"), are
13 residents and citizens of Santa Barbara, California.
14 2. Plaintiffs allege that venue lies in the County of Santa Barbara pursuant to § 395(a)
of the California Code of Civil Procedure because (*check all that apply*):

15 ☐ The injuries alleged herein occurred in this county.

16 ☒ At the commencement of the action, a Defendant resided in this
17 county.

- 18 3. Plaintiffs bring this action (*check all that apply*):

19 ☒ On behalf of themselves;

20 ☐ In representative capacity of the individual that sustained personal
21 injuries and damages, [INJURED PARTY FIRST NAME]
22 [INJURED PARTY LAST NAME], who is/was a citizen and resident
of [CITY, STATE];

23 ☒ For ALLISON WOOTEN, who sustained personal injuries and
24 damages as a result of her use of Defendants' products; and for
MICHAEL WOOTEN, for loss of society or consortium connected to
25 injuries sustained by ALLISON WOOTEN.

26 If any box is checked other than the first box, all references to Plaintiff in Paragraphs
27 4 through 8 of this Short Form Complaint refer to the primary injured party.
28

B. DEFENDANT(S)

4. Plaintiffs name the following Defendants in this action (*check all that apply*):

a. Manufacturing Defendants

☒ PFIZER INC.

☒ PHARMACIA LLC

☒ PHARMACIA & UPJOHN COMPANY LLC

b. Healthcare Defendants

☐ THE PERMANENTE MEDICAL GROUP, INC.

☐ SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP

c. Other Defendants. For each "Other Defendant," Plaintiff contends these additional parties are liable or responsible for Plaintiff's damages. Plaintiff may attach additional pages to this Short Form Complaint, if necessary.

☒ PLANNED PARENTHOOD CALIFORNIA CENTRAL COAST,
Citizenship: Santa Barbara, California.

☐ Click or tap here to enter text., Citizenship: Click or tap here to enter text.

☐ Click or tap here to enter text., Citizenship: Click or tap here to enter text.

PRODUCT USE

5. Plaintiff ALLISON WOOTEN used Depo-Provera from approximately 2001-2003
INJURIES

6. As a result of using Depo-Provera, Plaintiff ALLISON WOOTEN was diagnosed with a meningioma in approximately March 2025.

7. As a result of using Depo-Provera, Plaintiff ALLISON WOOTEN suffered and/or continues to suffer from the following additional injuries.

☐ Dizziness

☒ Vertigo

☐ Double vision

☐ Headaches

☐ Imbalance

☐ Weakness in limbs

☐ Depression

☒ Other:

- Surgical removal of meningioma
- Physical Pain

- Emotional Distress
- Mental Suffering
- Loss of Enjoyment of Life
- Anxiety
- Humiliation

8. Defendants proximately caused Plaintiff ALLISON WOOTEN's injuries.

CAUSES OF ACTION ASSERTED

9. The following claims and allegations are asserted by Plaintiffs in the Master Complaint and are herein adopted by reference.

☒ Count I – Strict Products Liability – Failure to Warn

☐ Count II – Strict Products Liability – Design Defect

☐ Count III – General Negligence

☒ Count IV – Negligent Failure to Warn

☒ Count V – Negligent Design

☒ Count VI – Negligent Misrepresentation

☒ Count VII – Fraud - Intentional Misrepresentation

☐ Count VIII – Violation of Consumer Protection Laws

☒ Count IX – Other: Loss of Consortium

☐ Against all Defendants.

☒ Against only the following Defendants:

Counts I, IV-VII, and IX are alleged against Pfizer Inc.; Pharmacia
LLC; Pharmacia & Upjohn Company LLC.

☒ Count X – Other: _____

☐ Against all Defendants.

☒ Against only the following Defendants:

Counts I, IV, and IX are alleged against Planned Parenthood California
Central Coast.

Plaintiff may attach additional pages to this Short Form Complaint, if necessary.

10. If applicable, Plaintiffs assert the following additional factual allegations against Defendants: As to Planned Parenthood California Central Coast, from whom Plaintiff ALLISON WOOTEN received Depo Provera injections, this matter is filed less than 3 years after the statute of limitations began to run under CCP 340.5. Plaintiffs were not reasonably aware of a negligent cause of Mrs. Wooten's injury, nor did she have a meaningful suspicion of negligence until a date less than three years from the date of filing this complaint. As to the Manufacturing Defendants, this complaint is filed less than two years from the date of discovery of her injury and knowledge of a wrongful cause. (Code of Civil Procedure §335.1.)

JURY DEMAND

11. Plaintiffs hereby demand a trial by jury as to all claims in this action.

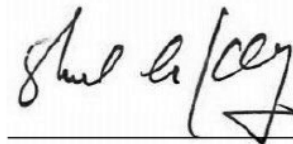
PRAYER FOR RELIEF

WHEREFORE, Plaintiffs have been damaged as a result of Defendants' actions or inactions and demands judgment against Defendants on each of the above-referenced causes of action, jointly and severally to the full extent available in law or equity, as requested in the Master Complaint for compensatory and punitive damages.

Dated: June 26, 2026

WALKUP, MELODIA, KELLY & SCHOENBERGER

By:



MICHAEL A. KELLY

DORIS CHENG

AMALIE YACH

Attorneys for PLAINTIFFS

ALLISON WOOTEN and MICHAEL WOOTEN